



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

JUL 07 2014

Federal Emergency Management Agency 4085
118-35 Queens Boulevard
Queens, New York 11375

RE: Bay Park Sewerage Treatment Plant Hazard Mitigation – Floodwall and Berm Construction
Environmental Assessment

Dear Sir or Madam:

The Environmental Protection Agency (EPA) has reviewed the Federal Emergency Management Agency's (FEMA) Environmental Assessment dated June 2014 on the proposed Bay Park Sewerage Treatment Plant Hazard Mitigation - Floodwall and Berm Construction. During Hurricane Sandy, the sewerage facility experienced severe flooding damage. The purpose of the proposed project is to protect the facility if/when another large storm enters the area. Bay Park Sewerage Treatment Plant is owned by the Nassau County Department of Public Works and is located in East Rockaway, New York.

The preferred alternative includes the construction of a combination earthen berm and concrete floodwall structure around the perimeter of the plant as the primary defense against flooding. The total length of the floodwall would be approximately 6,700 linear feet and the total length of the earthen berm would be approximately 1,800 linear feet. The EPA has the following comments, questions and concerns:

- While the document discusses two new pumping stations to be installed to ensure stormwater would continue to flow off-site during storm events, it is EPA's understanding that other repairs are being financed and constructed within this project as well. All aspects of the project should be discussed in the project description and purpose and need. This clarification is also necessary to determine emissions under the General Conformity Rule.
- The project description and background should include a full discussion of the Sandy Recovery Infrastructure Resilience Coordination Group and its discussions on the Bay Park Treatment Plant, the Plant's existing conditions, and future conditions concerning denitrification requirements.
- The document should discuss whether the floodwall and berm would inhibit the construction of any denitrification equipment or facilities necessary to meet Clean Water Act criteria and standards. The discussion should include the potential location of the equipment or facilities regardless of who will be funding the work and of current land ownership.

- Since the project is located in the floodplain, the EA should briefly describe what measures will be taken during the 12 to 24-month construction period to minimize impacts of a flood event to the project while being built and from the incomplete project to the surrounding area.
- To elucidate the mitigative capacity of the project, the EA should explain whether the proposed project would be protective against a storm surge similar to that which occurred during Hurricane Sandy and why a higher berm and floodwall would not be technically (based on available space) or economically (based on cost-benefit analysis) feasible.
- While EPA appreciates the EA being online, Appendix A should have been labeled as to its contents. For example, the hydraulic study was in Appendix A, Document B. In order to find document B, one needed to scroll through several sections of Appendix A.

General Conformity

- It is not clear whether total hydrocarbons (THC) are being used as a surrogate for volatile organic compounds (VOC). If so, then the calculated level exceeds the de minimis threshold (40 CFR 93.153(b)) for VOC (as an ozone precursor) and a full conformity determination would be required for that precursor.
- EPA's NONROAD model should be used to estimate emissions or emission rates. The model has been updated more recently than the 2004 emission rate document referenced in Table D3.
- The THC emission results shown in Table D3 appear to be incorrect. However, because of a lack of background data and calculations, this could not be verified by EPA. All assumptions, calculations, and data sources should be provided.
- Please include the source of the emission factors for calculating truck traffic emissions in Table D4.
- It appears that the on-road vehicle emissions were limited to just road dust emissions. Exhaust emissions associated with material transport and worker commutes should also be included in the general conformity analysis. Such emissions can be estimated with EPA's MOVES model.

Thank you for the opportunity to comment. If you have any questions, please call Lingard Knutson or my staff at (212) 637-3747.

Sincerely,



Grace Musumeci, Chief
Environmental Review Section